

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

M.J.J.,

Plaintiff,

v.

POLK COUNTY SHERIFF'S DEPARTMENT,
DARRYL L. CHRISTENSEN,

Defendants,

Case No. 15-C-433

and

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

J.K.J.,

Plaintiff,

vs.

POLK COUNTY SHERIFF'S DEPARTMENT,
and DARRYL L. CHRISTENSEN,

Defendants,

Case No. 15-C-428

and

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

DECLARATION OF SCOTT NARGIS

SCOTT NARGIS declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury,
that the following is true and correct:

1. I am Jail Captain of the Polk County Jail (the "Jail"). I make this declaration in support of the Polk County Sheriff's Department's Motion for Summary Judgment, and based upon my own personal knowledge of the facts attested to herein and upon my review of the business records at the Jail.

2. As Jail Captain, I serve as the Administrator for the Polk County Jail. I report directly to the Chief Deputy, and the Chief Deputy reports to the Sheriff.

3. As Jail Captain, I have some discretion in making personnel, administrative, and management decisions for the Polk County Jail.

4. I meet frequently with the Chief Deputy and Sheriff to review personnel issues, jail policies, employee training, and other matters related to the operation and administration of the jail.

5. The decisions I make as Jail Captain, including decisions regarding jail employee discipline and training, and jail policy and administration, are subject to review by the Chief Deputy Sheriff, and ultimately, by the Sheriff.

6. If either the Chief Deputy Sheriff or the Sheriff disagree with a policy or personnel decision of mine, they have the authority to overrule it.

7. Jail officers at Polk County Jail are trained to use Tasers, but do not carry them in the jail.

8. Attached hereto as **Exhibit A** is a true and correct copy of Section I-400 of the Polk County Jail Manual, which was in effect from 2011 through 2014.

9. With regard to training provided to staff within the Polk County Jail, I frequently advise Sheriff Johnson and Chief Deputy Moe of what training topics are being covered as they come up.

10. The chart below shows the number of inmates booked into the Polk County Jail by year from 2005 through 2015. Based on these figures, the average number of inmates at Polk County Jail is 1777 per year during that time frame.

YEAR	# OF BOOKINGS
2005	2,405
2006	2,051
2007	2,185
2008	2,016
2009	1,723
2010	1,526
2011	1,575
2012	1,516
2013	1,573
2014	1,573
2015	1,412

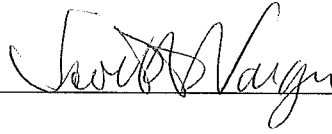
11. Attached hereto as **Exhibit B** is a letter from Allen Jorgensen to me, dated February 3, 2012, in which Allen Jorgensen tendered his resignation.

12. On March 30, 2016, Sheriff Johnson and I met with Kristi Dietz of the Wisconsin Department of Corrections. The meeting was not prompted by or specifically in relation to the incidents involved Darryl Christensen. At that meeting, Ms. Dietz provided posters that included notices recommended by the Prison Rape Elimination Act ("PREA").

13. A jail officer, or anyone else, cannot easily and clearly see into the inmates' showers. There is a small open area through the shower door at foot-to-calf level, and a window at shoulder/head level, which inmates frequently cover while in the shower. These openings are maintained for suicide prevention and inmate safety.

Dated this 16 day of August, 2016.

s/Scott Nargis
Scott Nargis

A handwritten signature in black ink, appearing to read "Scott Nargis", is written over a horizontal line.